UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

In re Bair Hugger Forced Air Warming	
Products Liability Litigation	MDL No. 15-2666 (JNE/DTS)

This Document Relates to All Actions

DECLARATION OF GENEVIEVE M. ZIMMERMAN

- 1. My name is Genevieve M. Zimmerman and I am a partner with the Meshbesher & Spence Ltd. law firm. I am a member of the Court appointed Co-Lead Counsel in the above entitled matter.
- 2. To the best of my knowledge, approximately 1,700 hip cases and 3,100 knee cases have been filed in this MDL.
- 3. Attached hereto as PX74 is a true and correct copy of the Affidavit of Dr. Jonathan Samet, dated May 14, 2019.
- 4. Attached hereto as PX75 is a true and correct copy of the Affidavit of Dr. William R. Jarvis, dated May 14, 2019.
- 5. Attached hereto as PX76 is a true and correct copy of 3MBH01983525.
- 6. Attached hereto as PX77 is a true and correct copy of Tsai, et al., *Forced Air Warming Device Failure Resulting in Smoke and Soot on a Surgical Patient*, OPEN ACCESS J. SURG. 4(A) 2017.
- 7. Attached hereto as PX78 is a true and correct copy of 3MBH0025006-08.

Dated: May 16, 2019 /s/ Genevieve M. Zimmerman

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Plaintiffs' Co-Lead Counsel